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APR 19 2018
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**U.S. COURT OF
FEDERAL CLAIMS**

U.S. CUSTOMS AND BORDER PROTECTION
U.S. DEPARTMENT OF HOMELAND SECURITY
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APR 19 2018
RECEIVED FROM KIRKLAND

We requested a response to our letter by no later than 5:00 p.m. EDT on April 13, 2018, confirming Mr. Goodsell's withdraw of the deposition notices, indicating whether he would prefer to proceed with depositions in the near term or await our document production, and identifying the specific written and oral communications about which he sought to inquire in the RCFC 30(b)(6) deposition. However, we did not hear from Mr. Goodsell by that deadline, and we have not received a response from Mr. Goodsell as of the date of this motion. Accordingly, out of an abundance of caution, we are filing this motion for a protective order, as our good faith efforts, as set forth above, to meet and confer have been unsuccessful.

For these reasons, we respectfully submit that good cause exists to issue a protective order, and respectfully request that the Court grant this motion and issue an order protecting the Government from the depositions noticed by Mr. Goodsell.


Respectfully submitted,

CHAD A. READLER
Acting Assistant Attorney General

ROBERT E. KIRSCHMAN, JR.
Director



L. MISHA PREHEIM
Assistant Director



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April 19, 2018

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 10th day of April, 2018, I caused to be placed in the United States mail (first-class, postage prepaid) a copy of "DEFENDANT'S MOTION FOR PROTECTIVE ORDER" addressed as follows:

Scott Goodsell
440 N. First Street, Suite 100
San Jose, CA 95112